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## Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

HAMED HAFEZY,  
Plaintiff,

V.

MERRICK B. GARLAND, in his official capacity as Attorney General, United States Department of Justice, *et al.*,

#### Defendants.

Case No. 3:24-cv-04584 LJC

**STIPULATION TO EXTEND TIME FOR  
DEFENDANTS' RESPONSE TO  
PLAINTIFF'S COMPLAINT; AND ORDER**

The parties, through their undersigned attorneys, hereby stipulate to an extension of time for Defendants' response to Plaintiff's complaint. Defendants will file their response on or before October 16, 2024.

The parties further request a corresponding extension on the deadline for filing a motion for summary judgment under the Court's Immigration Mandamus Procedural Order. Dkt. No. 7. Currently, Defendants must file a motion for summary judgment by 120 days after the complaint was served, or November 28, 2024. In view of the agreed-upon extension for Defendants' response to the complaint, the parties request that Defendants must file their motion for summary judgment by December 16, 2024.

1 Dated: September 24, 2024

Respectfully submitted,<sup>1</sup>

2 ISMAIL J. RAMSEY  
United States Attorney

3  
4 /s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
5 Assistant United States Attorney  
6 Attorneys for Defendants

7 Dated: September 24, 2024

8 /s/ Zachary Nightingale  
ZACHARY NIGHTINGALE  
9 Van Der Hout LLP  
Attorney for Plaintiff

10  
11 **ORDER**

12 Pursuant to stipulation, IT IS SO ORDERED.

13 Date: September 25, 2024

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15 LISA J. CISNEROS  
16 United States Magistrate Judge

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27 <sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
signatories listed herein concur in the filing of this document.

## **DECLARATION OF ELIZABETH D. KURLAN**

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On July 29, 2024, Plaintiff filed a complaint in which he seeks adjudication of his parents' applications for immigrant visas. *See* Dkt. No. 1. Our office was served with the complaint on July 31, 2024.

3. On September 9, 2024, my office contacted Plaintiff's counsel regarding Defendants' request for an extension of time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: September 9, 2024

/s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
Assistant United States Attorney